

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION**

THE STATE OF LOUISIANA,  
By and through its Attorney General, JEFF  
LANDRY, et al.,

PLAINTIFFS,

v.

XAVIER BECERRA, in his official capacity  
as Secretary of Health and Human Services, et  
al.,

DEFENDANTS.

Civil Action No. 3:21-cv-03970

District Judge Terry A. Doughty

Magistrate Judge Kayla D. McClusky

**PLAINTIFFS COMMONWEALTH OF KENTUCKY AND STATE OF OHIO'S NOTICE  
OF JOINDER TO MOTION FOR PRELIMINARY INJUNCTION (R. DOCS. 2 – 2-18)**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Plaintiffs Commonwealth of Kentucky and State of Ohio, through undersigned counsel, hereby consent to and join in its entirety the Motion for Preliminary Injunction, supporting memorandum, and all supporting exhibits filed on November 15, 2021 (R. Docs. 2 – 2-18) (the “Motion”).

This Joinder is based on the Motion and all exhibits and evidence attached thereto, all other matters of which the Court may take judicial notice, and any argument or evidence that may be considered or presented to or considered by the Court prior to its ruling. Plaintiffs Commonwealth of Kentucky and State of Ohio respectfully request that any relief ordered by the Court relative to the Motion also be ordered in favor of Plaintiffs Commonwealth of Kentucky and State of Ohio.

Dated: November 22, 2021

AUSTIN KNUDSEN  
Montana Attorney General  
David Dewhirst\*  
Solicitor General  
215 North Sanders Street  
Helena, MT 59601  
[David.dewhirst@mt.gov](mailto:David.dewhirst@mt.gov)

*Counsel for the State of Montana*

MARK BRNOVICH  
Arizona Attorney General  
Robert J. Makar\*  
Assistant Attorney General  
2005 North Central Avenue  
Phoenix, AZ 85004  
[Robert.makar@azag.gov](mailto:Robert.makar@azag.gov)

*Counsel for the State of Arizona*

STATE OF ALABAMA  
Office of the Attorney General Steve Marshall  
Edmund G. LaCour Jr.\*  
Solicitor General  
Thomas A. Wilson\*  
Deputy Solicitor General  
Office of the Attorney General  
501 Washington Ave.  
Montgomery, AL 36130  
Tel.: (334) 353-2196  
Fax: (334) 353-8400  
[Edmund.LaCour@AlabamaAG.gov](mailto:Edmund.LaCour@AlabamaAG.gov)  
[Thomas.Wilson@AlabamaAG.gov](mailto:Thomas.Wilson@AlabamaAG.gov)

*Counsel for the State of Alabama*

Respectfully Submitted,

By: /s/ Jimmy R. Faircloth, Jr.

ELIZABETH B. MURRILL (La #20685)  
Solicitor General  
J. SCOTT ST. JOHN (La #36682)  
Deputy Solicitor General  
MORGAN BRUNGARD\*  
JOSIAH KOLLMAYER (La #39026)  
Assistant Solicitors General  
LOUISIANA DEPARTMENT OF JUSTICE  
1885 N. Third Street  
Baton Rouge, Louisiana 70804  
Tel: (225) 326-6766  
[murrille@ag.louisiana.gov](mailto:murrille@ag.louisiana.gov)  
[stjohnj@ag.louisiana.gov](mailto:stjohnj@ag.louisiana.gov)  
[brungardm@ag.louisiana.gov](mailto:brungardm@ag.louisiana.gov)  
[kollmeyerj@ag.louisiana.gov](mailto:kollmeyerj@ag.louisiana.gov)

JIMMY R. FAIRCLOTH, JR. (La. #20645)  
[jfaircloth@fairclothlaw.com](mailto:jfaircloth@fairclothlaw.com)  
MARY KATHERINE PRICE (La. #38576)  
[kprice@fairclothlaw.com](mailto:kprice@fairclothlaw.com)  
Faircloth Melton Sobel & Bash, LLC  
105 Yorktown Drive  
Alexandria, Louisiana 71303  
Telephone: (318) 619-7755  
Facsimile: (318) 619-7744

*Counsel for the State of Louisiana*

CHRISTOPHER M. CARR  
Georgia Attorney General  
Drew F. Waldbeser\*  
Deputy Solicitor General  
Ross W. Bergethon  
Deputy Solicitor General  
Office of the Attorney General  
40 Capitol Square, S.W.  
Atlanta, Georgia 30334  
[dwaldbeser@law.ga.gov](mailto:dwaldbeser@law.ga.gov)

*Counsel for the State of Georgia*

LAWRENCE G. WASDEN  
Attorney General  
State of Idaho  
Brian Kane\*  
Chief Deputy Attorney General  
Leslie M. Hayes  
Megan A. Larrondo  
Deputy Attorneys General  
700 W. Jefferson Street, Ste. 210  
P.O. Box 83720  
Boise, Idaho 83720-0010  
Telephone: 208-334-2400  
Facsimile: 208-854-8071  
[brian.kane@ag.idaho.gov](mailto:brian.kane@ag.idaho.gov)  
[leslie.hayes@ag.idaho.gov](mailto:leslie.hayes@ag.idaho.gov)  
[megan.larrondo@ag.idaho.gov](mailto:megan.larrondo@ag.idaho.gov)

*Counsel for the State of Idaho*

LYNN FITCH  
Attorney General of Mississippi  
Whitney H. Lipscomb\*  
Deputy Attorney General  
John V. Coghlan\*  
Deputy Solicitor General  
State of Mississippi  
Office of the Attorney General  
550 High Street  
Jackson, MS 39201  
Tel: (601) 359-3680

*Counsel for the State of Mississippi*

SEAN D. REYES  
Utah Attorney General  
Melissa A. Holyoak\*  
Solicitor General  
350 N. State Street, Suite 230  
Salt Lake City, UT 84114  
[melissaholyoak@agutah.gov](mailto:melissaholyoak@agutah.gov)

*Counsel for the State of Utah*

THEODORE M. ROKITA  
Indiana Attorney General  
Thomas M. Fisher\*  
Solicitor General  
Indiana Government Center South 302 W.  
Washington St., 5th Floor Indianapolis, IN  
46204 [Tom.fisher@atg.in.gov](mailto:Tom.fisher@atg.in.gov)

*Counsel for the State of Indiana*

JOHN M. O'CONNOR  
Attorney General of Oklahoma  
Mithun Mansinghani\*  
Solicitor General  
313 NE 21st Street  
Oklahoma City, OK 73105  
(405) 521-3921

*Counsel for the State of Oklahoma*

ALAN WILSON  
South Carolina Attorney General Thomas T.  
Hydrick\*  
Assistant Deputy Solicitor General Office of  
the Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
[thomashydrick@scag.gov](mailto:thomashydrick@scag.gov)

*Counsel for the State of South Carolina*

PATRICK MORRISEY  
West Virginia Attorney General  
Lindsay S. See\*  
Solicitor General  
State Capitol, Bldg 1, Room E-26  
Charleston, WV 25305  
[Lindsay.s.see@wvago.gov](mailto:Lindsay.s.see@wvago.gov)

*Counsel for the State of West Virginia*

DANIEL CAMERON  
Kentucky Attorney General  
Marc Manley\*  
Assistant Attorney General  
700 Capital Avenue, Suite 118  
Frankfort, KY 40601  
[Marc.Manley@ky.gov](mailto:Marc.Manley@ky.gov)

*Counsel for the Commonwealth of Kentucky*

DAVE YOST  
Ohio Attorney General  
May Davis\*  
Deputy Solicitor General  
615 W. Superior Ave., 11<sup>th</sup> Floor  
Cleveland, OH 44113  
[May.Davis@OhioAGO.gov](mailto:May.Davis@OhioAGO.gov)

*Counsel for the State of Ohio*

*\*Pro Hac Vice admission application  
forthcoming*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I presented the above and foregoing for filing and uploading to the CM/ECF system which will send electronic notification of such filing to all counsel of record.

Alexandria, Louisiana, this 22nd day of November, 2021.

/s/ Jimmy R. Faircloth, Jr.

OF COUNSEL